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BY HAND

United States District Court
Eastern District of New York
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Gilead Sciences, Inc. et al. v. Safe Chain Solutions, LLC et al.*,
filed Ex Parte & Under Seal**

Dear United States District Court:

Enclosed are materials filed today *ex parte* and under seal commencing an action on behalf of Gilead Sciences, Inc. seeking emergency relief against defendants selling dangerous counterfeit HIV medications in New York and across the United States. These counterfeits do not contain the HIV medication listed on the label, but rather different drugs entirely—most commonly, a prescription antipsychotic that causes debilitating side effects. For these reasons, the plaintiffs move the court for an *ex parte* seizure order pursuant to 15 U.S.C. § 1116, a temporary restraining order, an asset freeze order, and an expedited discovery order.

We have requested an order that permits the plaintiffs to execute seizures at three primary locations connected to the counterfeits—in New York, Maryland, and Utah—which we plan to execute simultaneously. We have shared the details of the proposed seizure order with law enforcement officials in each jurisdiction, and they have told us that they can execute the order on Monday, July 26, should Your Honor grant such an order today or tomorrow. In anticipation of the execution, computer forensic specialists and private investigators have traveled to each location to assist the law enforcement officers.

I am available at any time to provide any additional information Your Honor may require. I can be reached at (917) 854-2310, and my colleagues Aron Fischer can be reached at (347) 731-5830 and Timothy Waters can be reached at (617) 308-8533. We are fully vaccinated and are waiting in the courthouse and are available to appear before Your Honor on short notice.

Respectfully submitted,



Geoffrey Potter